

### REMARKS

Reconsideration of the present application is respectfully requested.

The rejection of claims 1 and 16-19 under 35 USC 102(b) as being anticipated by Liu is respectfully traversed.

For a prior art reference to anticipate in terms of 35 U.S.C. 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 15 USPQ2d 1566, 1567 (Fed. Cir. 1990) (emphasis added).

Claim 1 features updating some of the registers via the bus. Claim 16 features updating at least one register or parameter via the bus. The Office Action contends that Liu identically shows those features. That contention is incorrect.

Liu discloses that the host computer 21 "initially" sets the head number, cylinder address, sector address and the number of sectors to be transferred in the task file registers of computer bus interface circuit 234. Liu further discloses that automatic read sequencer 250 and automatic write sequencer 260 automatically "update" the head number, cylinder address, sector address and the number of sectors to be transferred in the task file registers of computer bus interface circuit 234. The update function disclosed in Liu is not done via the bus 215. Therefore, that disclosure does not identically show updating at least one register or parameter via the bus (claim 1) or updating at least one register or parameter via the bus (claim 16). As a result, claims 1 and 16 are not anticipated and are allowable. Dependent claims 17-19 are also allowable due to their dependency on allowable claim 16.

The rejection of claims 2-5 under 35 USC 103(a) as being unpatentable over Liu and in view of Cloke is respectfully traversed.

Claims 2-5 depend from claim 1. Claim 1, as explained above, is not anticipated. Nor does the Office Action provide any objective evidence that claim 1 is obvious. Cloke does not overcome that deficiency of Liu. Therefore, claims 2-5 are allowable due to their dependence on allowable claim 1.

The rejection of claims 15 and 20 under 35 USC 103(a) as being unpatentable over Liu in view of Bowes et al. is respectfully traversed.

Claim 15 features "the bus controllable ... to update several of the registers." As explained above for claims 1 and 16, Liu does not anticipate this feature. And the Office Action

does not provide any objective evidence that that feature is obvious. Bowes et al. does not overcome that deficiency of Liu. Therefore, claim 15 is not obvious and is allowable.

Claim 16 features updating at least one register or parameter via the bus. As explained above, Liu does not anticipate this feature. And the Office Action does not provide any objective evidence that that feature is obvious. Bowes et al. does not overcome that deficiency of Liu. Therefore, claim 16 is not obvious and is allowable. Dependent claim 20, then, is allowable due to its dependence on allowable claim 16.

The rejection of claims 6-14 under 35 USC 103(a) as being unpatentable over Liu and Cloke in view of Bowes et al. is respectfully traversed.

Claim 6 features "retrieving ... several values indexed by zone identifier Z<sub>B</sub>." The Office Action contends that this feature is shown in Liu. Yet the Office Action notes that Cloke teaches at least two zones having identifiers Z<sub>A</sub> and Z<sub>B</sub>. That means the Office Action implicitly acknowledges that no single reference, particularly Liu, teach that feature. Therefore, the Office Action must provide some objective evidence that this claim 6 feature is explicitly or implicitly taught or suggested. This the Office Action has not done. As a result, a *prima facie* case of obviousness has not be set forth. Claim 6 is then allowable, along with dependent claims 7-14.

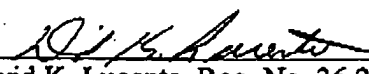
As explained above, all the pending claims are patentable over the applied references. The examiner is respectfully requested to allow all the pending claims, and pass this case to issuance.

Respectfully submitted,

SEAGATE TECHNOLOGY LLC  
(Assignee of Entire Interest)

Date

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